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3006465-MJM

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**OLGA MARQUEZ and
EDUARDO MARQUEZ,**

Plaintiff,

vs.

TARGET CORPORATION,

Defendant.)

No.: 08 C 990

**Presiding Magistrate
Judge Sidney I. Schenkier**

**MOTION FOR ENTRY OF
STIPULATED PROTECTIVE ORDER**

NOW COMES Defendant, TARGET CORPORATION, (hereinafter "Target") by and through its attorneys of record, SMITHAMUNDSEN LLC, and files this Motion for Entry of Stipulated Protective Order. In support thereof, Defendant states as follows:

1. This case involves plaintiffs who allege that Olga Marquez was injured at Defendant Target's premises. In that regard, Plaintiffs seek discovery of certain documents of Defendant Target, which may include documents containing internal policies and procedures, employee training materials, employee information, and inventory lists.

2. The aforesaid documents are the product of confidential research and development by Defendant Target, and include commercial and trade secret information used by Target in the conduct of its business.

3. Defendant Target has thus requested that Plaintiffs agree to a Stipulated Protective Order, filed herewith as Exhibit A and submitted to the Court for consideration in accordance with Court rules. Plaintiffs have agreed to the Stipulated

Protective Order.

4. The parties and their respective counsel are aware of the Court's requirements for Proposed Protective Orders and procedures for challenging materials designated by counsel to be Confidential.

5. Counsel for Target has discussed this motion with counsel for Plaintiffs, who is not opposed to the relief requested herein.

WHEREFORE, Defendant TARGET CORPORATION respectfully requests that the Court enter the Stipulated Protective Order attached hereto and submitted separately for the Court's consideration.

SMITHAMUNDSEN LLC

By: /s/ Camille M. Knight
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